

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA :

14 Cr. 810 (CM)

- against - :

MOSHE MIRILASHVILI, :

Defendant. :

**NOTICE OF MOTION
IN SUPPORT OF
DEFENDANT MOSHE
MIRILASHVILI'S
PRE-TRIAL MOTIONS**

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PLEASE TAKE NOTICE, that upon the annexed Declaration of Joshua L. Dratel, Esq., and all prior papers and proceedings herein, the defendant, MOSHE MIRILASHVILI, will move before the Honorable Colleen McMahon, United States District Judge for the Southern District of New York, at the United States Courthouse located at 500 Pearl Street, New York, at a time and date to be set by the Court, or as soon thereafter as counsel may be heard, for the following relief:

- (a) an Order suppressing any and all evidence obtained as a result of searches of Dr. Mirilashvili's home and office and, in the alternative, a hearing pursuant to *Franks v. Delaware*, 438 U.S. 154 (1978);
- (b) an Order directing the Government to produce the requested Bill of Particulars, as detailed in the accompanying Memorandum of Law;
- (d) leave to join in his co-defendants' motions for severance, and in any future motions counsel is not apprised of at the time of the filing, to the extent they inure to his benefit; and,

for any such other and further relief as to the Court seems just and proper.

Dated: New York, New York
7 August 2015

/S/ Joshua L. Dratel
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Attorneys for Defendant Moshe Mirilashvili

To: CLERK OF THE COURT

UNITED STATES ATTORNEY
SOUTHERN DISTRICT OF NEW YORK

ALL DEFENSE COUNSEL